

UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA

Case No. 2:24-cv-00379-ROS

TAYJALAYA S. WILLIAMS,

Pro Se Defendant

2240 S Elks Lane Unit 13

Yuma, Arizona 85364

[Tayjalayastormwilliams@gmail.com](mailto:Tayjalayastormwilliams@gmail.com)

928-408-1422

Plaintiff: Transamerica Life Insurance Company et al.

Defendants: Tayjalaya S. Williams, Collin A. Retzlaff, Brittany A. Retzlaff, and Denise A. Hollas



#### DEFENDANT'S EXHIBIT LIST

1. **Exhibit A:** Original Policy

**Description:** Life insurance policy executed by Thomas C. Retzlaff on August 21, 2018, prior to meeting Defendant Williams.

**Date:** August 21, 2018

**Relevance:** Establishes the existence and terms of the life insurance policy before Defendant Williams met Thomas Retzlaff.

Exhibit Number: 1

2. **Exhibit B:** Domestic Partnership Filing

**Description:** Documentation of the domestic partnership filing between Thomas Retzlaff and Defendant Williams.

**Date:** May 17, 2021

**Relevance:** Demonstrates the formal relationship between Thomas Retzlaff and Defendant Williams.

Exhibit Number: 2

3. **Exhibit C:** Beneficiary Designations

**Description:** Documentation showing Thomas Retzlaff designated Defendant Williams as the primary beneficiary at 75%, reducing Collin Retzlaff's share to 25%.

**Date:** May 20, 2021, recorded on June 1, 2021

**Relevance:** Validates the beneficiary changes made by Thomas Retzlaff.

**Exhibit Number:** 3

4. **Exhibit D:** Marriage Affidavit and License

**Description:** Paperwork signed by Thomas Retzlaff and Defendant Williams for a marriage affidavit.

**Date:** June 18, 2021

**Relevance:** Supports the legitimacy of the relationship and the intentions regarding beneficiary designations.

**Exhibit Number:** 4

5. **Exhibit E:** Final Beneficiary Designation

**Description:** Documentation showing Defendant Williams was designated as the 100% sole primary beneficiary on the day of her marriage to Thomas Retzlaff.

**Date:** August 28, 2021

**Relevance:** Confirms the final beneficiary designation.

**Exhibit Number:** 5

6. **Exhibit F:** Policy Terms

**Description:** Specific terms from Thomas Retzlaff's insurance policy.

**Date:** Policy Date

**Relevance:** Confirms that changes to the beneficiary designation take effect as of the date signed, even if the insured is not living.

**Exhibit Number:** 6

7. **Exhibit G:** Supporting Communications

**Description:** Email communications between Defendant Williams and Thomas Retzlaff confirming his intent to designate her as the sole beneficiary.

**Date:** Various Dates

**Relevance:** Corroborates Thomas Retzlaff's intent and concerns regarding his safety and Defendant Williams' financial security.

Exhibit Number: 7

8. **Exhibit H:** Harassment Concerns

**Description:** Text communications between Thomas Retzlaff and Defendant Williams expressing concerns about harassment from Collin Retzlaff and associates.

**Date:** August 8, 2021

**Relevance:** Highlights issues impacting Thomas Retzlaff's decisions regarding beneficiary designations.

Exhibit Number: 8

9. **Exhibit I:** Official Police Report

**Description:** Official police report from the El Mirage Police Department confirming Defendant Williams is not a suspect.

**Date:** July 3, 2024

**Relevance:** Refutes Transamerica's allegations and supports Defendant Williams' innocence.

- **Exhibit I.1:** Pages 2-3 of the police report stating Defendant Williams is not a suspect.
- **Exhibit I.2:** Page 56 of the police report confirming no evidence against Defendant Williams.
- **Exhibit I.3:** Proof of transmission of the police report to Defendant Williams from the El Mirage Police Department.

Exhibit Number: 9

10. **Exhibit J:** El Mirage Police Department Call Log

**Description:** Call log detailing communication between Defendant Williams and Detective Vargas.

**Date:** April 18, 2024

**Relevance:** Verifies Defendant Williams' status in the investigation and contradicts Transamerica's claims.

Exhibit Number: 10

11. **Exhibit K:** Email Communication with Transamerica

**Description:** Emails between Defendant Williams and Transamerica regarding allegations and clarifications.

**Date:** June 10, 2024, to June 21, 2024

**Relevance:** Demonstrates the inconsistency in Transamerica's allegations.

Exhibit Number: 11

12. **Exhibit L:** Plaintiff's Response to Defendant's Motion

**Description:** Document No. 22 filed by Transamerica with contradicting allegations.

**Date:** April 17, 2024

**Relevance:** Highlights contradictions in Transamerica's position.

Exhibit Number: 12

13. **Exhibit M:** Interest Entitlement

**Description:** Insurance policy provisions detailing interest on the death benefit.

**Date:** Policy Date

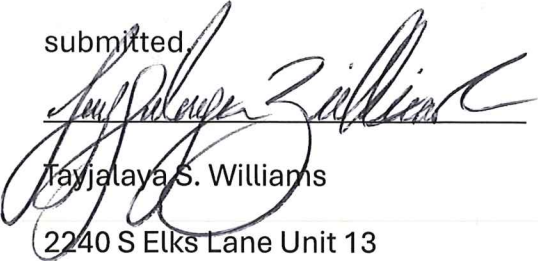
**Relevance:** Supports Defendant Williams' claim for interest from the date of death to the date of payment.

Exhibit Number: 13

Dated this day of July, 2024.

<sup>16</sup>  
Respectfully

submitted.



Tayjalaya S. Williams

2240 S Elks Lane Unit 13

Yuma, Arizona 85364

[Tayjalayastormwilliams@gmail.com](mailto:Tayjalayastormwilliams@gmail.com)

928-408-1422